

Re: Spoliation notice

From Steven Moser < steven.moser@moserlawfirm.com>

Date Tue 10/29/2024 1:24 PM

То Randi Cohen <randi@kalmansoncohen.com>; Shirley Navarro-Losito <shirleylosito@moserlawfirm.com>

Сс Joni Kletter <joni@kalmansoncohen.com>; Kimberly Kalmanson <kim@kalmansoncohen.com>

Randi

We believe that your "spoliation notice" is based upon speculation. Also, your own client does not have any text messages regarding his termination, presumably because none exist. Yet, we have not thrown about allegations of spoliation. We suggest that the parties schedule depositions.

Steve Moser

From: Randi Cohen <randi@kalmansoncohen.com>

Sent: Friday, October 25, 2024 1:52 PM

To: Steven Moser <steven.moser@moserlawfirm.com>; Shirley Navarro-Losito

<shirleylosito@moserlawfirm.com>

Cc: Joni Kletter <joni@kalmansoncohen.com>; Kimberly Kalmanson <kim@kalmansoncohen.com>

Subject: Spoliation notice

Steve:

Please see the attached.

Regards,

Randi

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